

# **EXHIBIT A**

**EXHIBIT A – PLAINTIFF ADAPTIX’s PROPOSED SCHEDULE**

Event	Date
Initial Case Management Conference [Civil L.R. 16-10]	July 16, 2013
Plaintiff's Initial Disclosure of Asserted Claims & Preliminary Infringement Contentions & accompanying document production [Patent L.R. 3-1 & 3-2] <b>≤14 days after Initial CMC</b>	July 30, 2013
Defendant's Preliminary Invalidity Contentions & accompanying document production [Patent L.R. 3-3 & 3-4] <b>≤45 days after L.R. 3-1 &amp; 3-2</b>	August 30, 2013
Parties to exchange Proposed Terms & Claim Limitations for Construction [Patent L.R. 4-1(a)] <b>≤14 days after L.R. 3-3 &amp; 3-4</b>	September 13, 2013
Parties to exchange Preliminary Claim Constructions [Patent L.R. 4-2(a)] <b>≤21 days after L.R. 4-1</b>	October 14, 2013
Parties to file Joint Claim Construction & Prehearing Statement; parties to exchange expert declarations or other disclosures on claim construction for any experts who will submit declarations or testify regarding claim construction at the Claim Construction Hearing. [Patent L.R. 4-3] <b>≤60 days after L.R. 3-3 &amp; 3-4</b>	October 29, 2013
Claim Construction Discovery Cut-Off [Patent L.R. 4-4] <b>≤30 days after filing L.R. 4-3</b>	November 29, 2013
Plaintiff to file Opening Brief on Claim Construction [Patent L.R. 4-5(a)] <b>≤45 days after filing L.R. 4-3</b>	December 6, 2013
Defendant to file Responsive Brief on Claim Construction [Patent L.R. 4-5(b)] <b>≤14 days after filing L.R. 4-5(a)</b>	December 20, 2013

1	Plaintiff to file Reply Brief on Claim Construction [Patent L.R. 4-5 (c)] <b>≤ 7 days after filing L.R. 4-5(b)</b>	December 30, 2013
2		
3	Claim Construction ( <i>Markman</i> ) Hearing and Technical Tutorial <b>≤ 2 week after submitting L.R. 4-5(c)</b>	February 6, 2014 or such other date amenable to the Court's calendar
4		
5	Production of Advice of Counsel [Patent L.R. 3-7] <b>≤ 50 days after <i>Markman</i> ORDER</b>	
6		
7	Fact Discovery Cut-off	July 14, 2014
8	Parties with burden of proof designate expert witnesses (non-construction issues)of	August 25, 2014
9	Expert witness reports due	September 18, 2014
10	Parties designate rebuttal expert witnesses (non- construction issues)	September 29, 2014
11	Rebuttal expert witness reports due	October 13, 2014
12	Close of Expert Discovery	November 10, 2014
13	Deadline to File Dispositive Motions	November 24, 2014
14	Opposition briefs on dispositive motions	December 22, 2014
15	Reply briefs on dispositive motions	January 5, 2015
16	Hearing of Dispositive Motions	February 2, 2015, or such other date amenable to the Court's calendar
17	Pretrial Conference	April 6, 2015, or such other date amenable to the Court's calendar
18		
19	Initial Trial	April 14, 2015, or such other date amenable to the Court's calendar